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AT-082

MEMORANDUM

SUBJECT: Retention of Calendar Quarter Reporting Within New Source Performance Standards

FROM: Gary L. O'Neal, Director  
Air and Toxics Division

TO: John Seitz, Director (EN-341)  
Stationary Source Compliance Division

Along with most of the other regional Air Division Directors I agree that the reporting frequency for sources subject to New Source Performance Standards (NSPS) self-monitoring requirements should remain at quarterly. The reporting frequency should not be changed to semiannually. We appreciate the concerns of the Office of Management and Budget (OMB) for promoting efficient recordkeeping and reporting requirements within Federal regulations. However, we maintain that the ability of the Regions and of the delegated State agencies to implement NSPS and to accomplish the latest management objectives would be seriously hampered by the reduction in reporting frequency of source self-monitoring data.

We recommend you renegotiate with OMB an agreement to retain calendar quarter reporting within the final rulemaking package. This change in NSPS reporting was originally proposed September 29, 1987. At the time of SSCD's agreement for a reduced reporting frequency, it appeared to OMB that the air program did not utilize the information being submitted by the NSPS sources. This situation no longer exists. The latest policy statement and compliance strategies all direct the Regions and the States to evaluate source self-monitoring reports as a means of assessing and tracking continuous compliance. We see that it is clearly counterproductive for the reporting frequency of those reports to be reduced to once per 180 days when that data is simultaneously being promoted for use within the 120-day time frame of "Timely and Appropriate" guidance.

Thank you for your consideration.

sdm/sl/0057X/p.55/8/16/88

del MORAL SCHULTZ ABEL